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INTERVENOR
#1 NH



BellSouth Telecommunications, Inc.
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Patrick W. Turner
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January 23, 2006

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of Palmetto Utility Protection Service, Incorporated for Assignment
of the 811 Abbreviated Dialing Code to be Implemented in South Carolina
Generic Proceeding to Investigate Emergency Services Continuity Plans
Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Petition to Intervene in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of the petition as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner".

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
DM5 #618511

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Application of Palmetto Utility)
Protection Service, Incorporated for)
Assignment of the 811 Abbreviated)
Dialing Code to be Implemented)
in South Carolina)
_____)

Docket No. 2005-390-C

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION TO INTERVENE**

Pursuant to S. C. Code Regs. 103-836 and in compliance with the Notice of Filing issued on December 21, 2005, BellSouth Telecommunications, Inc. ("BellSouth") respectfully petitions the Public Service Commission of South Carolina ("the Commission") for permission to intervene as a formal party of record in the above-captioned proceeding. In support of this Petition, BellSouth shows as follows:

1. BellSouth is a public utility presently providing comprehensive telecommunications services to its subscribers pursuant to intrastate tariffs approved by the Commission.

2. BellSouth's authorized representative in this proceeding is:

Patrick W. Turner
BellSouth Telecommunications, Inc.
1600 Williams Street, Suite 5200
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3. At this time, BellSouth does not object to the Applicant's request. To the extent that issues regarding the implementation of the Applicant's request are addressed in this

proceeding, however, the Commission's decision on those issues could affect BellSouth's interests. BellSouth, therefore, is requesting to intervene in order to be heard on any such issues that may arise in this docket.

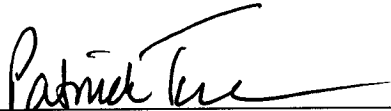
4. BellSouth has not yet fully developed its position in this proceeding.
5. Granting BellSouth's Petition will not cause any undue delay.
6. BellSouth reserves the right to testify and present evidence at the hearing.

At this time, BellSouth does not know how much time would be required for such presentation.

WHEREFORE, based on the foregoing, BellSouth requests the following relief:

1. that it be allowed to intervene as a formal party of record in this proceeding by this Commission's granting its Petition to Intervene;
2. that any parties of record be directed to provide BellSouth with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and
3. that the Commission grant such other relief as it deems just and proper.

Respectfully submitted on this 23rd day of January, 2006.



PATRICK W. TURNER
Suite 5200
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Columbia, South Carolina 29201
(803) 401-2900
BELLSOUTH TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Petition to Intervene in Docket No. 2005-390-C to be served upon the following this January 23, 2006:

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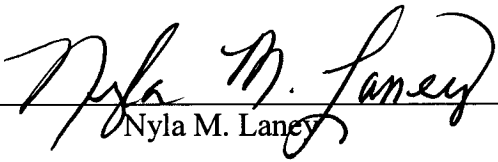
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